

# **EXHIBIT 57**

1

2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

3

-----X  
MARK I. SOKOLOW, et al.,

4

PLAINTIFFS,

5

6

-against-

Case No:  
04CV397 (GBD) (RLE)

7

8

THE PALESTINE LIBERATION ORGANIZATION, et  
al.,

9

DEFENDANTS.

10

-----X

11

12

DATE: October 14, 2012

13

TIME: 6:25 P.M.

14

15

DEPOSITION of CHANA GOLDBERG,

16

taken by the Defendants, pursuant to Notice

17

and to the Federal Rules of Civil

18

Procedure, held at the offices of Morrison

19

& Foerster, 1290 Avenue of the Americas,

20

New York, New York 10104, before Robert X.

21

Shaw, CSR, a Notary Public of the State of

22

New York.

23

24

25

1 Chana Goldberg

2 loss.

3 Do you know if your mother was  
4 able to see your father after the bombing?

5 A. After the bombing?

6 Q. Aha.

7 A. I don't know, and I prefer not  
8 knowing.

9 Q. Do you know if anyone was able  
10 to identify your father?

11 A. I don't know.

12 Q. Okay. Chana, do you have any  
13 information about who carried out the  
14 attack?

15 A. A PA policeman.

16 Q. And how did you come to find  
17 out --

18 A. A terrorist, that's all I know.

19 Q. Okay. How did you come to find  
20 out that the person was a PA policeman?

21 A. I don't remember.

22 I just knew, just something  
23 that everyone new, it was all over the  
24 news, it was all over the place. That is  
25 the only thing that I knew.

1 Chana Goldberg

2 for all that stuff, so I really don't know.

3 I don't know these things.

4 My mother is taking care of  
5 whatever it is that she does know, and I am  
6 relying on her for that, and the lawyers  
7 are doing the rest.

8 Q. Okay. Do you know why you are  
9 suing the PLO or the PA?

10 A. They helped out the terrorists.

11 Q. Do you have any evidence that  
12 the PA had anything to do with this attack  
13 that killed your father?

14 A. I am relying on my lawyers for  
15 all that stuff.

16 Q. Okay. So, would it be fair to  
17 say that you don't have any personal  
18 knowledge about the PA or the PLO's  
19 involvement, if any, in this attack?

20 A. Besides hearing and knowing  
21 what I -- yes.

22 Q. Okay. You say besides hearing  
23 and knowing, so, you have heard --

24 A. I don't have any evidence of  
25 anything. I am relying on my lawyers to

1 Chana Goldberg

2 get that together.

3 Q. Any evidence that you know of,  
4 you have gotten from your attorneys; is  
5 that accurate?

6 A. Yes. I guess.

7 Q. Okay. So, what I would like to  
8 talk about now is just base line health  
9 issues before January, 2004. Let's say  
10 before February, 2004; okay?

11 A. Yes.

12 Q. So before February, 2004, did  
13 you suffer from any health issues?

14 A. No.

15 Q. Did you ever have episodes of  
16 anxiety?

17 A. No.

18 Q. Did you experience lack of  
19 concentration before February of 2004?

20 A. Absolutely not.

21 Q. Were you a good student before  
22 February, 2004?

23 A. Um, a great student.

24 Q. So, you got good grades?

25 A. Yes.